

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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| In re:<br><br>STEWARD HEALTH CARE SYSTEM<br>LLC, <i>et al.</i> ,<br><br><div style="text-align: right;">Debtors.<sup>1</sup></div> | §<br>§<br>§<br>§<br>§<br>§<br>§<br>§ | Chapter 11<br><br>Case No. 24-90213 (CML)<br><br>(Jointly Administered)<br><br><b>Re: Docket No. 3617</b> |
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**CERTIFICATE OF COUNSEL REGARDING DEBTORS’  
APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE  
EMPLOYMENT AND RETENTION OF LATHAM & WATKINS LLP AS  
CO-COUNSEL FOR THE DEBTORS EFFECTIVE AS OF DECEMBER 2, 2024**

1. On January 3, 2025, Steward Health Care System LLC (“**SHC**”) and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), filed the *Debtors’ Application for Entry of an Order Authorizing the Employment and Retention of Latham & Watkins LLP as Co-Counsel for the Debtors Effective as of December 2, 2024* [Docket No. 3617] (the “**Latham Retention Application**”), with a proposed order granting the relief requested in the Latham Retention Application (the “**Initial Proposed Order**”) attached thereto [Docket No. 3617]. Objections to the Latham Retention Application were required to be filed and served on or prior to January 24, 2025 (the “**Objection Deadline**”).

2. On January 23, 2025, the United States Trustee for the Southern District of Texas (the “**U.S. Trustee**”) filed the *United States Trustee’s Objection to the Debtor’s Application for Entry of an Order Authorizing the Employment and Retention of Latham & Watkins LLP as Co-*

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/Steward> (the “**Case Website**”). The location of the Debtors’ corporate headquarters and service address for purposes of these chapter 11 cases is: 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

*Counsel for the Debtors Effective as of December 2, 2024* [Docket No. 3776] (the “**Objection**”), objecting to the Latham Retention Application. The Debtors have resolved the Objection with the U.S. Trustee by agreeing to language reflected in the revised proposed form of order attached hereto as **Exhibit A** (the “**Revised Proposed Order**”). A redline of the Revised Proposed Order against the Initial Proposed Order is attached hereto as **Exhibit B**.

3. In accordance with paragraph 44 of the *Procedures for Complex Cases in the Southern District of Texas*, the undersigned counsel represents to the Court that the Objection Deadline has passed and, other than the Objection, (i) the undersigned counsel is unaware of any objection to the Latham Retention Application; and (ii) the undersigned counsel has reviewed the Court’s docket and no objection to the Latham Retention Application appears thereon.

4. Accordingly, the Debtors respectfully request entry of the Revised Proposed Order.

Dated: February 18, 2025  
New York, New York

**LATHAM & WATKINS LLP**

By: /s/ Ray C. Schrock  
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*Proposed Co-Counsel to the Debtors*

**CERTIFICATE OF SERVICE**

I certify that on February 18, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Ray C. Schrock  
Ray C. Schrock